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- 4.12 The discussion of "Operational Impacts to Surface Waters" in Section 4.10.2 leaves open questions about the effect on Black Partridge Creek. According to the DSFEIS in Section 2.11.2, Black Partridge Creek has deteriorated significantly in the past five years due to interruptions in cool surface and groundwater flow, extensive erosion, increased water temperatures in the Creek's headwaters, vegetation removal, and point source contamination. Since the proposed tollway extension will directly cross one of the Creek's tributaries as well as a large portion of its watershed, how will the construction and operation of the road affect these worsening problems? Might it further disrupt cool surface flow, increase erosion, remove vegetation, or cause other adverse impacts?
- 4.13 The DSFEIS discussion of "Operational Impacts to Surface Waters" also fails adequately to describe the effects of surface water runoff laden with road salt on the surrounding environment. The FEIS statement that such runoff does not significantly harm aquatic life in "large or flowing bodies of water" is an incomplete answer. What will the effect be on aquatic areas that are not large and have low or intermittent flows (such as Fraction Run, Fiddymont Creek, Big Run, Long Run) or no flow at all (such as the numerous wetlands that may receive runoff from the roadway)? Also, what will be the effects on terrestrial areas?
- Finally, the DSFEIS discussion of salt spray from the road is informative but never answers the important question: what will the effect be on the aquatic and terrestrial environment? The estimates of salt deposition are never translated into increased soil and water concentrations. Further, the discussion fails to identify which salt-sensitive species might be within range of the spray, and whether the anticipated levels of spray will harm those species.
- b. Section 4.10.3 "Impacts to Wetlands"
- The FEIS and DSFEIS detail many of the harmful effects the roadway will likely have on wetlands. Some questions, however, remain unanswered.
- 4.15 The DSFEIS fails to address questions about the ability of Wetlands 42, 43, and 44 to accommodate the roadway runoff they will absorb. This runoff is likely to have high salt concentrations at certain times of the year, as well as other pollutants associated with roadways (oils, gasoline residues, etc.). What will be the likely concentrations of salt and of other pollutants in the runoff from the detention pond, and what is the ability of the biota in Wetlands 42, 43, and 44 to tolerate these pollutants?
- 4.16 Similarly, the DSFEIS leaves unanswered the question of how well Wetlands 42, 43, and 44 can handle direct runoff from the roadway. The FEIS stated that any storm event greater than the two-year storm event – not a very high threshold – will cause the stormwater-collection structures on each pier of the Des Plaines River Valley bridge to overflow, spilling the polluted runoff directly into the wetlands instead of routing it to the "energy stilling basin." The DSFEIS fails to analyze the impacts on the wetlands of this sort of event.
- 4.18 Finally, the FEIS, pp. 2-35 and 2-43, described "Wetland 44" as harboring an Illinois-listed species (slender sandwort) and a rare sedge (*Carex crawei*) and having a Natural Area Rating Index of 36.4, which is high enough to qualify it as possessing "sufficient conservatism and richness to be of profound importance from a regional perspective." The DSFEIS, however, omits any mention of this wetland and appears to lump it in with lower-quality areas as a new "Wetland 42" with a significantly lower rating. (The "Wetland 44" described in the DSFEIS is a

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- different wetland.) Since the original Wetland 44 appears to be directly within the path of (or extremely close to) the roadway and of unusually high quality, it is unclear why consideration of it is no longer included in the DSFEIS. How will the environmental benefits of this wetland (wildlife habitat, sediment trapping, flood storage) and its rare and threatened species be protected?
- c. Section 4.10.5 "Impacts to Seeps"
- 4.19 The DSFEIS fails to fill one of the gaps left by the FEIS regarding seeps, namely the effect of the roadway on the Des Plaines River seeps. According to the FEIS, these seeps support a "noteworthy" biological community of intact native plant communities and a rich diversity of plant species, many of which are uncommon species in Illinois that occur only in calcareous seep habitats. Yet the FEIS failed to note any impacts the construction or operation of the roadway would have on these seeps (though it did note the harmful impacts on the Black Partridge Creek seeps), and the DSFEIS similarly does not address the issue. Will groundwater disruptions or increased pollutant loadings during construction or operation affect the seeps? If so, how will these effects be mitigated?
2. Section 4.11.3 "Threatened and Endangered Species"
- 4.25 The DSFEIS does not explain how to mitigate impacts on the foraging of the state-threatened great egret, night heron, double-crested cormorant, pied-billed grebe, and common moorhen. FEIS Section 4.11.3.2 noted that roadway construction would "reduce or eliminate" the foraging grounds near the roadway for these birds, but listed no mitigation measures (other than that the birds might become habituated to humans or that disturbances might decrease as foliage eventually grows and screens the birds from human activity).
3. Section 4.20 "Secondary and Cumulative Impacts"
- 4.40 When discussing the roadway's possible secondary effects, the DSFEIS states that the Tollroad / Freeway Alternative will cause additional population growth of 2% or less. A more useful measure, however, would be estimated additional land development. A study of highway construction in Maryland found that properties near highways tended to be developed more intensively and more rapidly than properties not located near highways. For example, in Montgomery County, 93% of all developed properties within five miles of I-270 and beyond the beltway were built after the highway was constructed. Similarly, land near highway corridors in Frederick County developed three times faster than land outside the highway corridors. *Paving the Way: How Highway Construction Has Contributed to Sprawl in Maryland* (Brad Heavner, Maryland Public Interest Research Group, 2000). Is it possible to estimate increased land development, rather than just increased population?
- 4.41 Section 4.20 fails to address the likely impacts of infrastructure extension to accommodate the increased population and land development the roadway will cause. Increased local road construction, sewer service extension, and utility construction all would be likely secondary impacts that the DSFEIS does not consider.
- 4.43 Section 4.20 further fails to address the possible secondary impacts of the roadway on open space and protected areas envisioned in local plans. According to Exhibit 1-7, local plans call for greenways and protected areas along Long Run, Big Run, Fiddymont Creek, Fraction Run, and Spring Creek. All of these areas are located in close proximity to interchanges for the

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proposed roadway. Presumably, development pressures would make it more difficult to protect these lands as open space and greenways, but the DSFEIS does not address these impacts or propose mitigation measures.

III. Conclusion

Given the deficiencies noted above, Openlands Project has serious reservations about the preferred alternative. While the FEIS and DSFEIS analyze much important information, they still leave essential questions unanswered. It is not reasonable to choose the Tollroad / Freeway Alternative as "recommended" when the environmental impacts of the other alternatives have been omitted; when fiscal and environmental factors are not considered in the performance analysis; and when important questions about environmental effects and mitigation have not been answered.

Openlands thanks you for the opportunity to comment on the DSFEIS.

Sincerely,

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DEPARTMENT OF
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January 16, 2001

Reply to: 921 East Washington Street
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Mr. John P. Kos, P.E.
District Engineer
Illinois Department of Transportation
Division of Highways/District 1
201 West Center Court
Schaumburg, Illinois 60196-1096

RE: Project and Environmental Studies
FAP 340 Interstate 355 South Extension
Interstate 55 to Interstate 80

ATTENTION: PATRICK J. PECHNICK, P.E., BUREAU CHIEF OF PROGRAMMING

Dear Gentlemen:

The City of Joliet, Department of Public Works & Utilities, received the Project and Environmental Study for the above-mentioned proposed Interstate 355 South Extension on December 29, 2000. According to the study, Interstate 355 is proposed to be extended from Interstate 55, south to Interstate 80 through a corridor from Lemont, Lockport, Homer Township, and Joliet/New Lenox. The proposed alignment would be south/southeast from the intersection of Interstate 355, Interstate 55 to Interstate 80 near Cedar Road.

Further, the study recommends the proposal of a toll road/freeway highway for this section of roadway. This highway will be constructed with six lanes from Interstate 55, south to 127th Street, with four-lanes from 127th Street, south to Interstate 80.

The City of Joliet strongly supports the extension of Interstate 355, from I-55 south to I-80, in the above-mentioned alignment. This corridor is required to provide capacity and safety for north/south travel to northeastern Will County/Cook County.